

June 20, 2012

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Connect America Fund*, WC Docket NO. 10-90; *Windy City Cellular Petition for Waiver*, WT Docket No. 10-208

Dear Ms. Dortch:

On June 19, 2012, Chris Nierman and Megan Delany of General Communication, Inc. (“GCI”), and John Nakahata of Wiltshire & Grannis LLP, on behalf of GCI, met Courtney Reinhard, wireless legal advisor to Commissioner Ajit Pai, regarding Windy City Cellular’s Petition for Waiver (“WCC Petition”)¹ of the Commission’s annual \$3,000 per-line cap on high-cost support received by a competitive eligible telecommunications carrier (“CETC”).²

GCI provided Ms. Reinhard with the attached overview of the Alaska telecommunications environment. It also provided Ms. Reinhard with a copy of GCI’s ex parte letter of June 11, 2012, which is incorporated by reference herein.³ GCI reviewed the contemporaneous deployment of wireless services on Adak Island by both GCI and Windy City, as well as GCI’s approximate costs of providing service, as discussed in its June 11, 2012 ex parte letter. GCI discussed how its operations on Adak Island are not standalone operations, but depend on its Anchorage facilities to provide some core functionalities. These shared facilities, combined with the ability to spread general corporate overhead across a larger service area and customer-base, allows GCI to provide wireless service more efficiently than would be possible with a standalone operation. Since January 1, 2012, GCI has been providing service on Adak Island subject to the annual \$3,000 per-line cap, and has no plans to discontinue its service, provided that GCI continues to have a healthy environment for offering statewide wireless service and that the Commission does not further reduce high cost universal service support for CETCs operating in Remote Alaska. GCI does not believe that its wireless service on Adak

¹ See Petition of Windy City Cellular, LLC, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, WT Docket No. 10-208, and GN Docket No. 09-51 (filed Apr. 18, 2012)

² See 47 C.F.R. § 54.307(e).

³ See Notice of Ex Parte, John Nakahata, Counsel, General Communications, Inc., to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90, WT Docket No. 10-208 (filed June 11, 2012).

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Island is dependent upon Adak Eagle Enterprises for facilities that could not be replaced, if necessary.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata". The signature is fluid and cursive, with the first name "John" being more prominent.

John T. Nakahata
Counsel to General Communication Inc.

cc: Courtney Reinhard

Universal Service and Alaska

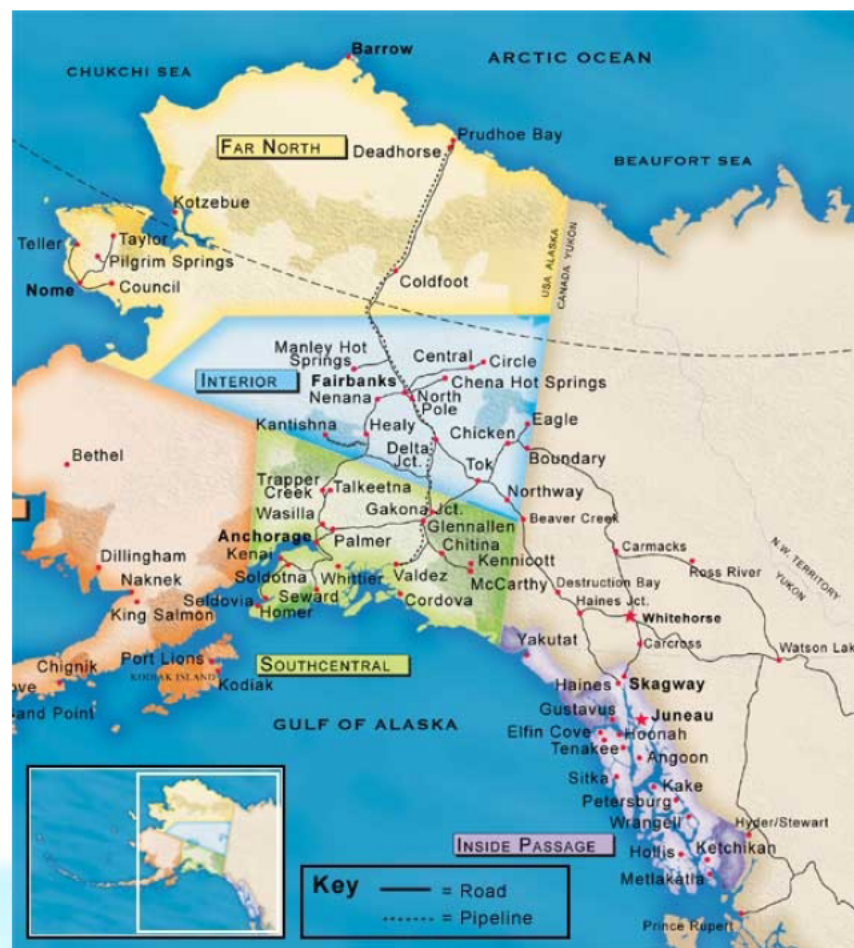
General Communication Inc.

June 2012

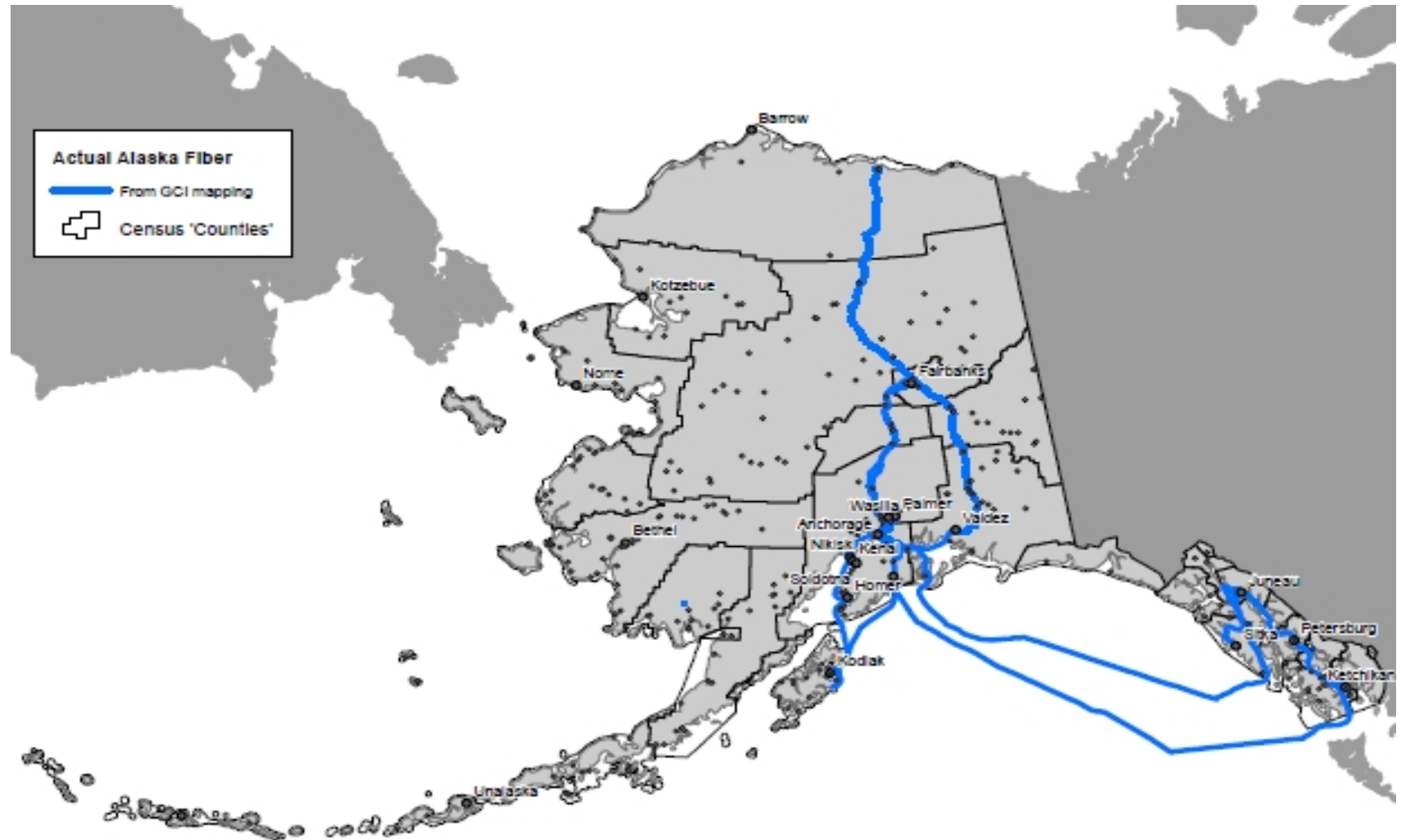


Alaska's Unique Universal Service Challenges

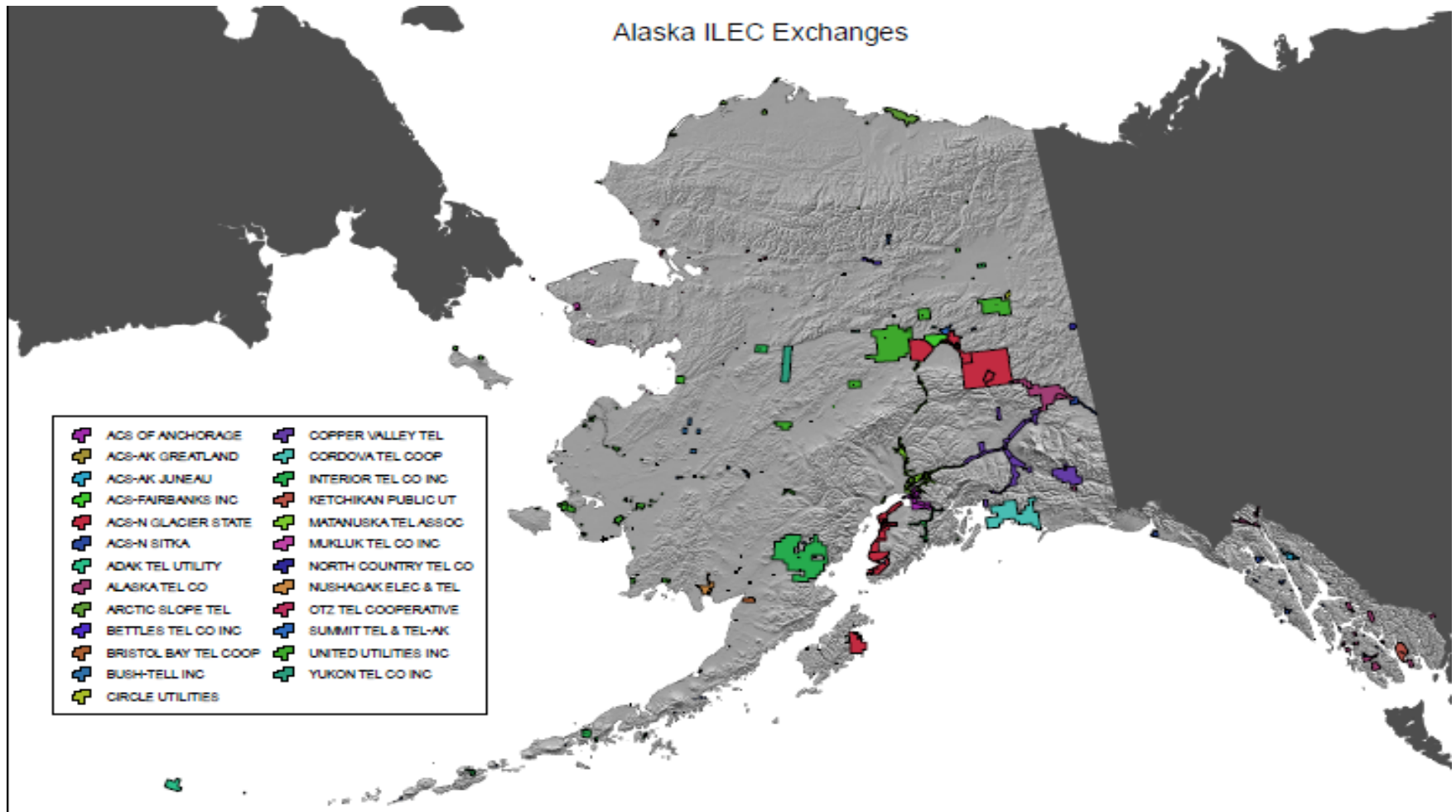
- Enormous
 - 570,627 Square Miles, roughly 1/5 the size of the lower 48
- Sparse Population
 - 710,231 residents
 - Approximately 1.2 persons per square mile, compared to 103.8 persons per square mile in the lower 48
- Limited road/pipeline/rail system
 - Over 200 communities are “off-road”
- Rural areas rely on satellite to connect to urban centers.



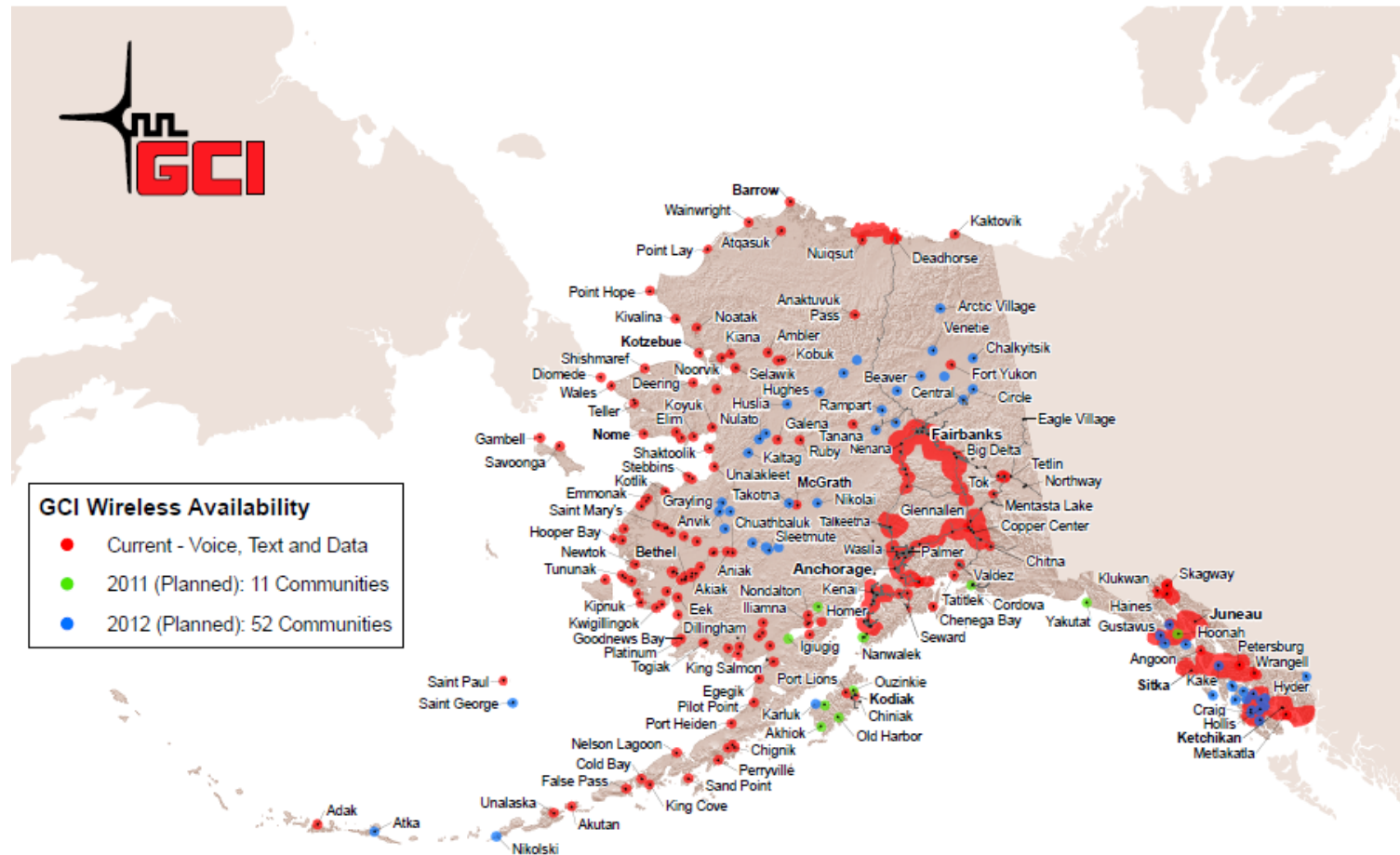
Alaska's Fiber "Backbone"



Alaska's Incumbent Telephone Exchanges



Universal Service – Bringing Mobile Wireless to Rural Alaska



What it's all about –

